

Comments on BPL - Docket 04-37

(1) The proposal is about measurement methods but the implication is that BPL will be allowed regardless of harm to the amateur radio service. In the proposal it is said that amateurs can orient their directional antennas away from the noise. Not all amateurs have directional antennas. Also that is not the way they are used. They are turned towards the station being listened to and only rarely would they be offset to improve the signal-to-noise ratio. Conceptually spread spectrum would work if done properly so as not to create interference. But the operative word is "properly." The words "adaptive mitigation" were used. What a fancy way to say: "Complain and we'll fix it sometime." I'll bet it is not fixable.

(2) BPL is not really needed. A wireless system similar to WiFi could be used with repeaters on top of power poles.

(3) Everything in the proposal is philosophy - where are the hard numbers, the data? It is hard to make a judgement without hard data. The FCC should have presented something. So far the only data I know of is what the ARRL has presented. I have just learned of the NTIA report. No time to read it yet but I have heard that it indicates there could be real problems.

(4) The bottom line is this: If BPL by spread spectrum methods works without degrading my reception, then great; otherwise it should not be allowed. That is what plain common sense and decency require. I sincerely hope that this is not controlled by the old rule: HE WHO HAS THE GOLD MAKES THE RULES.

Background of commenter:

Age, 80 years; amateur radio operator, 63 years; call sign, K9ZT

Education: BS, MSE Electrical Engineering; PhD Physics

Professional experience: Industry, 20 years; Academia, 20 years; principal experience in numerical computation and particle accelerator design.

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